

Inspection Date	10/12/2001
Time Start	
Time Finish	

INSPECTION REPORT
S Q GENERATOR

Company name Ĉ R	Warner-Yankee Point Termi	MA LD Number PAORON	538827
	W Passyunk Ave	1.5. (1.6.1.5.)	00001
	Johia Municipality Philos	Jelohia zio 1915	53
	nichelle Milburn		
Name & Title of Respon	nsible Official Robert Krawleck	i President	
Person Interviewed	Rose Krawiecki	Telephone ( 215 ) 720	0-4300
	rent from above)Samu		
•	Vaste Generated per Month: 7220	Pounds	Kat
1. Site Characterization			
	ontainer 🔲 Tanks 🔲 Containment Bldg	o □ Drin Pad Other	
•	eutralization/WWTP	Other	
	TMENT Containers Tanks		
	☐ Large Quantity Handler ☐ Small Qu		
	Types	auntity manufor	
3. Hazardous Waste Ti			· · · · · · · · · · · · · · · · · · ·
	e	License Number	
·	e		
·			
. Types of nazardous	waste generated and destination facility	(location & type).	
Waste Code	Waste Description	Destination Faci	lity
			,
	/ ()		
i)CO1	solvent/flammable		
	liquids		
		1	

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CR Worner - 4PT ID Number PA00005 38827 Date 10/12/2001

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined

4 - Non Compliance

Hazardous waste determination performed on all waste streams  Identification Number  Authorized transporters only  Subsequent notification requirements met  Proper manifest used  Manifests filled out correctly and completely  Manifests signed and routed properly	262a.10 262a.10 262a.12(b) 262a.10 262a.20	262.11 262.12 262.12(c) 262.21	H001 H002 H003 H004 H005
Authorized transporters only  Subsequent notification requirements met  Proper manifest used  Manifests filled out correctly and completely  Manifests signed and routed properly	262a.10 262a.12(b) 262a.10 262a.20	262.12(c)	H003
Subsequent notification requirements met  Proper manifest used  Manifests filled out correctly and completely  Manifests signed and routed properly	262a.12(b) 262a.10 262a.20		H004
Proper manifest used  Manifests filled out correctly and completely  Manifests signed and routed properly	262a.10 262a.20	262.21	1
Manifests filled out correctly and completely  Manifests signed and routed properly	262a.20	262.21	H005
Manifests signed and routed properly		1	
	,		HCOP-
	262a.23(a)	262.23	HC07
Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	1 HC08
SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	HC09
SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
Personnel training program per 265.16 complied with	262a.10	252.34(a)(4) 262.34(d)	H012
Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
Specified records retained for three years	262a.10	262,40(c)	H014
Biennial reports submitted to the Department (LQG only)	262a.41	252.41	H015
Exception reporting procedures followed	262a.42	252.42	H016
Spill reporting procedures followed	262a.10	262.34(d)	HC17
PPC plan developed and implemented	262a.10	262.34(a)	HC18_
Special requirements followed for international shipments			HC19
Source reduction strategy prepared and available (LQG only)	262a.100		H020
Excluded waste complies with exclusionary requirements	2613.4	251.4	HC21
	200 mile distance rule applies - 270 days  SQG waste accumulated on-site never exceeds 6000 kg  Satellite accumulation requirements complied with  Personnel training program per 265.16 complied with  Manifest exception and biennial reports retained for 3 years  Specified records retained for three years  Biennial reports submitted to the Department (LQG only)  Exception reporting procedures followed  Spill reporting procedures followed  PPC plan developed and implemented  Special requirements followed for international shipments  Source reduction strategy prepared and available (LQG only)	SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days  SQG waste accumulated on-site never exceeds 6000 kg 262a.10  Satellite accumulation requirements complied with 262a.10  Personnel training program per 265.16 complied with 262a.10  Manifest exception and biennial reports retained for 3 years 262a.10  Specified records retained for three years 262a.10  Biennial reports submitted to the Department (LQG only) 252a.41  Exception reporting procedures followed 262a.42  Spill reporting procedures followed 262a.10  PPC plan developed and implemented 262a.10  Special requirements followed for international shipments 262a.10  Source reduction strategy prepared and available (LQG 262a.100 only)	SQG waste accumulated on site for 180 days max unless 262a.10 262.34(e)(f)  SQG waste accumulated on-site never exceeds 6000 kg  Squaste accumulation requirements complied with 262a.10 262.34(e)(f)  Personnel training program per 265.16 complied with 262a.10 262.34(d)  Manifest exception and biennial reports retained for 3 years 262a.10 262.40(a)(b)  Specified records retained for three years 262a.10 262.40(e)  Biennial reports submitted to the Department (LQG only) 262a.41 262.41  Exception reporting procedures followed 262a.42 262.42  Spill reporting procedures followed 262a.10 262.34(d)  PPC plan developed and implemented 262a.10 262.34(a)  Special requirements followed for international shipments 262a.10 262.50  Source reduction strategy prepared and available (LQG 262a.100 262a.100 262.50)  Source reduction strategy prepared and available (LQG 262a.100 262a.100 262.30)

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS **FACILITY SPECIFICS**

Site Name CR Warner - YPT ID Number PA 000538827 Date 10/12/2001

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

1.	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
$\boxtimes$				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
XI	1	$\perp$		Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173	·	H030
Y			I	Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
ΧĹ			F	Proper containment and collection systems in place	265a.179		H033
			1	Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	HC35
$\Box$			C	Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
			C	containers labeled accurately identify contents	SWMA		H037
					6018.403(b)		
					(2)		

Date of Inspection 10/12/2001	Identification Number PA 0000538827
Company/Facility/Site Name _ CR Warner- You	nkee Point Terminal
A large quantity hazardous w	aste generator inspection
was conducted by michelle milburn.	
with the PADEP. Present for the facility	,
in the past year this facility	,
their operations. Due to new or	<u></u>
facility no longer generates	<b>9</b> 1
pazardous waste. The facility	, , , , , , , , , , , , , , , , , , ,
Ranotification Form in order	to change their generator
classification to "Conditionally	1-Exempt Small Quantity
Generator."	, .
No violations Cited	
This inspection report is notice of the findings of an inspectior report is formal notification of any violations observed during the insp concerning either violations noted herein, or other violations ider Department records.	pection. Additional notification of violations may be issued ntified as a result of review of laboratory analyses or
This report does not constitute an order or other appealable a be deemed to grant or imply immunity from legal action for any violati Signature by the person interviewed does not necessarily imp acknowledge that the person was shown the report or that a copy w	ion noted herein. Dly concurrence with the findings on this report, but does
Person interviewed (signature) Lase Kenneike	Date 1012 01
Inspector (signature) Michelle Milliu	M
	Page <u>4</u> of <u>4</u>

2510-FM-LRWM0301 Rev. 5/99 Part A

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



## HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS – PART A

Date of Inspection 4/10/2001	Time Start	Time finish			
Name of Inspector Michelle Milburn					
Transporter Company Name C R _ W	arner, Inc.				
Inspection Location LoOSO West	Passyunk Ave.	, Philadolphia, PA 19153			
county Philadelphia	Municipality Ph	iladelphia			
EPA Identification Number PAOO	0538827				
Name of responsible official Robert	Krawiecki				
Title <u>President</u>					
Mailing Address <u>Same</u>					
ea Code and telephone number 215	-726- 4300				
Name of person interviewed Rose	Krawiecki				
Title					
Mailing address (if different from above)	same				
Area code and telephone number 50	me				
a. Pa. hazardous waste transporter	(HWT) license number PA	- AH 04100			
b. Expiration date 4/30/20					
2. Hazardous waste handling: X N/A					
a. Blending Mixin					
b. Storage Trea	tment Disposal				
c. Use Reus	e 🔲 Recycle	Reclaim			
3. Does the transporter generate hazardo	us wastes? 💢 Yes	□ No □ N/A			
4. Types of hazardous waste produced by Hazardous Waste Number:					
F005. Toluene	>				

F002- Waste Petroleum Product

2510-FM-LRWM0301 Rev. 5/99 Part B

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



## HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS – PART B

Site Name <u>CR Warner</u> , Inc.	ID Number PA 00005 38827	Date 4/10/	2001

1-No Violation Observed 2-Not Applicable 3-Not Determined 4-Non-Compliance

STATUS			Federal				
4	2	3	4	REQUIREMENT	PA Citation 25 PA Code	Citation 40 CFR	LINE
X				Identification number	263a.11	263.11	H500
X				Company licensed by PA DEP	2639.13		H501
χ̈́				License conditions met: License card on vehicle	SWMA 6018.403a		H502
X				License conditions met: PPC plan on vehicle	SWMA 6018.403a		H503
X				License conditions met: Insurance card on vehicle	SWMA 6018.403a		H504
X				The Transporter's Name is printed or typed on the manifest	263a.20(2)		H505
X				Properly completed manifest accompanies all shipments	263a.10	263.20(c)	H506
X				Required number of copies of the manifest accompanies shipment	263a.10	263.20(c)	H507
X				Entire quantity delivered as stated on manifest	263a.10	263.21(a)	H508
X				Undeliverable shipment procedures followed	263a.10	263.21(b)	H509
X				Only normal in-transit storage of waste	263a.12	263.12	H510
X				In-transit storage contingency plan approved by department for storage up to 10 days	263a.12		H511
X				Records retained at designated location	263a.10	263.22	H512
X				Proper action taken as a result of a spill.	263a.30	263.30	H513
X			- 1	Hazardous waste discharge during transportation properly cleaned up.	263a.10	263.31	H514
X				Department notified of spill event during transportation	263a.30		H515

Page 2 of 3

Date of Inspection 4/10/2001 Identification Number PA 0000538827
Company/Facility/Site Name <u>CR. Warner, Inc</u>
A hazardous waste transporter inspection was
conducted by Michelle Millburn, Waste Management
Specialist, with the PADEP. Present for the facility was Rose Krawiecki.
A truck inspection was conducted. The truck contained the up-to-date insurance information and PADEP transporter license card. A PPC Plan and Operations Manual are also kept in the cab of the truck. The truck is properly labeled and contains spill equipment. Hazardous waste manifests for the past year were reviewed. All manifests were properly completed.
Quarterly reports are submitted to the PADEP.  No Violations Cited.
This license with PADEP expires April 30, 2002. CR
warner will likely not be renewing the license.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Kuse Kraureck: Date 4/10/01
Inspector (signature) <u>Michelle Milbum</u>



Inspection Date	10 23 2000
Time Start	10:15 Am
Time Finish	

H	IAZARDOUS WASTE	INSPECTION REPORT
X	GENERATOR	S Q GENERATOR

Company name C.C.	Warner, Inc.		I.D. Number PAO	1005 3881
	W. Passyunk Ave.			
County Philadelp	hia Municipality	Philadelphia	7in 19	153
	ichelle Milburn	T. P. December 1		V
	ble Official Robert Kro	mierki, Pr	resident	
	5e Krawiecki			126-4300
	nt from above) Same		, oropiiono ( <u></u>	
	ste Generated per Month: _>	2200 Pa	ounds	Ka
Site Characterization				
	ı. ntainer ☐ Tanks ☐ Conta	ainment Blda 🗖 Dri	in Pad Other	
	utralization/WWTP Recla		Other	
	MENT Containers			
	Large Quantity Handler			
	ypes		idildioi	
3. Hazardous Waste Tra				
	CR Warner	,	icense Number PA-	AH OHNO
	C F VOOTOS			
	waste generated and destina			
4. Types of flazardous v	vaste generated and destina		on a type).	
Waste Code	Waste Descrip	otion	Destination F	acility
FOOS	waste Toluen	0	marisol, In	ıc.
			middusex, No	
			N3D002454	
F002	Maste Petroleum	Product	Keystone Cem Both, PA	wnt
			PAD 0023895	59

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CR Warner ID Number PA0000538827 Date 10 | 23 | 2000 |

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

		3		REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X	T			Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	016
X		$\perp$		Spill reporting procedures followed	262a.10	262.34(d)	11017
$\times$				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X			•	Source reduction strategy prepared and available (LQG only)	262a.100		H020
X	+	+	+	Excluded waste complies with exclusionary requirements	261a.4	261.4	H021
	1		1				
+	+	+	+				

### HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name \_ CR Warner \_ ID Number PA 0000538827 Date \_ 10 23 2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

-		_		
	0	т	П	•

1	2	3	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
Γ	Γ	Γ	CONTAINERS (Subchapter I)			
X			Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X			Containers of hazardous waste in good condition	265a.1	265.171	H026
X			Containers and stored waste compatible	265a.1	265.172	H027
X			Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X			Containers managed to prevent leaks	265a.1	265.173(b)	H029
X			Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
χ			Container storage areas inspected at least weekly	265a.1	265.174	H031
Χ			Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X			Proper containment and collection systems in place	265a.179		H033
Χ			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X			Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X			Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X			Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

Date of Inspection 10 23 2000 Identification Number PA 0000536821
Company/Facility/Site Name
A hazardous waste (large-quantity) generator inspection of C.R.
Warner was conducted by Michelle Milburn, Solid Waste Specialist, with
the PADEP. Present from CR Warner was Rose Krawiecki.
The on-site lab was inspected. This lab has one satellite
accumulation container for waste toluene. This container was properly
labeled. The main storage area was inspected. Presently the storage area
contains tone drum of waste tolvene. This drum is properly labeled
and dated. The containment area has filled up with some water, probable
from recent rain. Mrs. Krawiecki stated that she would have this waste
Storage area cleaned at. The facility also generates some hazardous
waste oil when they must refuse an incoming waste oil shipment. There
was not any hazardous waste oil on-site at the time of the inspection.
Manifests were reviewed. Tolvene was last shipped out on Blible
waste petroleum product was last shipped aut on July 22,2000. All
manifests were fully and properly completed. Training records
were reviewed for annual training (includes Right to Know, Hazwoper,
PPE & moterials handling) as well as a recent spill training.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature)
Person interviewed (signature) <u>Four Kunnich</u> Inspector (signature) <u>Wichelle Millum</u>
Page <u>4</u> of <u>5</u>

Date of Inspection vol 23   2000 Identification Number PA00005 3882 7
Company/Facility/Site Name C.R. Warner, Inc.
The PPC Plan and the Source Reduction Strategy are on site and
have not changed since the last inspection. Paily inspections are
conducted and the log forms were reviewed. The facility Biennial
Report was submitted; a copy is kept on file at the facility.
No violations are being cited.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) Person Executive Date 10 23 00
Inspector (signature) <u>Michelle Millrum</u>

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Date of inspection_19 June 2000	Identification Number PA00005	538827
Company/Facility/Site Name C.R. Warner, Inc.		
A follow-up hazardous waste generator partial insp Milburn, Solid Waste Specialist, with the Department of E		ducted by Michelle
The following observations were made:		
1) On June 15, 2000, a letter was received from Caissued on April 20, 2000. Attached to the letter was a Forwaste. This Source Reduction Strategy was reviewed and	n 25R Source Reduction Strate	gy for hazardous
The following violation has been corrected:		
Line H020: A source reduction strategy was unable to be Code Chapter 262a.100. The facility should prepare and it this document on site and available for inspection.		
One violation has	been corrected	
A copy of this report was mailed to the facility on a from the March 1, 2000 inspection have been corrected. I storage in the tanker trucks is pending the receipt of a narr	lowever, a decision regarding t	he hazardous waste
This inspection report is notice of the findings of an inspection of notification of any violations observed during the inspection. Additional not herein, or other violations identified as a result of review of laboratory analyses. This report does not constitute an order or other appealable action imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply comperson was shown the report or that a copy was left with the person.	tification of violations may be issued co or Department records. of the Department. Nothing contained he	ncerning either violations noted rein shall be deemed to grant or
Person interviewed (signature) copy mailed to facility	Date	6/19/2000
Inspector (signature) <u>Michelle Millrun</u>	Date	6/19/2000
		Page of

2510-FM-LRWM0301 Rev. 5/99 Part A

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



## HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS – PART A

Date of Inspection June 1, 2000 Time Start 10:00 Am Time finish
Name of Inspector Michelle Milburn
Transporter Company Name C.R. Warner, Inc.
Inspection Location 6050 W. Passyunk Ave., Philadelphia, PA 19153
County Philadelphia Municipality Philadelphia
EPA Identification Number PAOCCO538827
Name of responsible official Robert Krawiecki
Title President
Morring Address
Area Code and telephone number 215 - 726 - 4300
Name of person interviewed Rose Krawiecki
Title Manager
Mailing address (if different from above) 50000
Area code and telephone number 215-726-4300
1. a. Pa. hazardous waste transporter (HWT) license number PA - AHO460
b. Expiration date 4/30/2001
2. Hazardous waste handling:  N/A
a. 🗌 Blending 🔲 Mixing
b. Storage Treatment Disposal
c. Use Reuse Recycle Reclaim
3. Does the transporter generate hazardous wastes?    Yes   No   N/A
4. Types of hazardous waste produced by Hazardous Waste Number:

FOOS- Toluene

FOUZ - Waste Petroleum Product

2510-FM-LRWM0301 Rev. 5/99 Part B

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT



## HAZARDOUS WASTE INSPECTION REPORT TRANSPORTERS – PART B

Site Name C.R. Warner	ID Number	PA 0000538827	Date _	6/1/2000	_
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1-No Violation Observed 2-Not Applicable 3-Not Determined 4-Non-Compliance

STATUS		 5		<b>DA 6</b> (4.4)	Federal	T	
1	2	3	4	REQUIREMENT	PA Citation 25 PA Code	Citation 40 CFR	LINE
X				Identification number	263a.11	263.11	H500
X				Company licensed by PA DEP	263a.13		H501
X				License conditions met: License card on vehicle	SWMA 6018.403a		H502
X				License conditions met: PPC plan on vehicle	SWMA 6018.403a		H503
X				License conditions met: Insurance card on vehicle	SWMA 6018.403a		H504
X				The Transporter's Name is printed or typed on the manifest	263a.20(2)		H505
X				Properly completed manifest accompanies all shipments	263a.10	263.20(c)	H506
X				Required number of copies of the manifest accompanies shipment	263a.10	263.20(c)	H507
X				Entire quantity delivered as stated on manifest	263a.10	263.21(a)	H508
X				Undeliverable shipment procedures followed	263a.10	263.21(b)	H509
X				Only normal in-transit storage of waste	263a.12	263.12	H510
X				In-transit storage contingency plan approved by department for storage up to 10 days	263a.12		H511
X				Records retained at designated location	263a.10	263.22	H512
X				Proper action taken as a result of a spill.	263a.30	263.30	H513
X				Hazardous waste discharge during transportation properly cleaned up.	263a.10	263.31	H514
ΧĪ				Department notified of spill event during transportation	263a.30		H515

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

INOI EGITOR RELIGION GOMMENTO
Date of inspection 01 June 2000 Identification Number PA0000538827
Company/Facility/Site Name C.R. Warner, Inc.
A hazardous waste transporter inspection of C.R. Warner was conducted by Michelle Milburn and Andy Sinclair, Solid Waste Specialists, with the Department of Environmental Protection. Present from C.R. Warner were Rose Krawiecki and Javier Arrospide, Plant Manager.
The following observations were made:
1) C.R. Warner has a hazardous waste transporter license (# PA-AH 0460) covering 31 of their trucks. This license was recently renewed on April 30, 2000. While many of the tanker trucks are licensed to transport hazardous waste, only a few of the trucks are actually used to transport the hazardous waste petroleum to eystone Cement. At the time of the inspection none of the regularly used trucks were on site.
2) One truck that was being serviced was available for inspection. The truck contained an operations manual which included MSDS sheets and information contact lists. There was also another binder that contained a copy of the facility PPC Plan. Each driver carries a packet with them on all trips which contains the PA Hazardous Transporter License and the insurance cards.
3) Manifests were available and were inspected. C. R. Warner is also the generator of the hazardous wastes that they transport. Therefore, the generator, transporter and return copies were on file for each shipment. All manifests were properly completed.
No Violations Are Being Cited
A copy of this report was mailed to the facility on the date indicated below. The results of this inspection were discussed with Ms. Krawiecki before leaving the facility.
This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.
Person interviewed (signature) copy mailed to facility Date 6/5/2000
Inspector (signature) Michelle Millum Date 6/5/2000

Page <u>3</u> of <u>3</u>

### COMMONWEALTH OF PENNSYLVANIA **DEPARTMENT OF ENVIRONMENTAL PROTECTION** BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS					
Date of inspection 01 June 2000 Identification	Number PA00005	538827			
Company/Facility/Site Name C.R. Warner, Inc.					
A follow-up hazardous waste generator partial inspection of C.R. Milburn and Andy Sinclair, Solid Waste Specialists, with the Department from C.R. Warner were Rose Krawiecki and Javier Arrospide, Plant Ma	ent of Environmen	<u> </u>			
The following observations were made:					
1) On May 3, 2000, a letter was received from C. R. Warner in a issued on April 20, 2000. A letter was also sent to the Division of Report agarding the manifest violations on manifest number PAX 9497283. It manifests which were used since the last inspection were reviewed. All	orting (PADEP) in Ouring the site visit	Harrisburg, PA, it of June 1, 2000,			
2) Included with the letter of May 3, 2000 was a copy of the fac SRS addressed the residual waste streams produced at the facility. In or pertain to large-quantity hazardous waste generators, the facility should that addresses the hazardous waste streams produced at the facility.	der to satisfy the	regulations as they			
The following violation have been corrected:					
Line H006: A manifest was found that was not fully completed. Block destination facility was not designated on the manifest. This is contrary incorporated by 25 PA Code Chapter 262a.20, and to 25 PA Code Chapter designate a destination facility that is permitted to handle the waste on each bould also ensure that all outgoing manifests are fully and properly contract.	to 40 C.F.R. Partiter 262a.20(1). Cach outgoing man	t 262.20(b), as C. R. Warner should			
The following violation is still outstanding:					
Line H020: A source reduction strategy was unable to be located during Code Chapter 262a.100. The facility should prepare and implement a sthis document on site and available for inspection.	-				
This inspection report is notice of the findings of an inspection conducted by a repostification of any violations observed during the inspection. Additional notification of violations identified as a result of review of laboratory analyses or Department reaches the report does not constitute an order or other appealable action of the Department imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the person was shown the report or that a copy was left with the person.	ons may be issued co cords.  Nothing contained he	ncerning either violations noted rein shall be deemed to grant or			
Person interviewed (signature) copy mailed to facility	Date	6/8/2000			
Inspector (signature) Michelle Millium	Date	6/8/2000			

Page \_ 1 \_ of \_ 2

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### **INSPECTION REPORT COMMENTS**

INSPECTION REPO	KI COMMENTS	
Date of inspection 01 June 2000	Identification Number PA000	0538827
Company/Facility/Site Name C.R. Warner, Inc.		
One violation is outstanding. One A copy of this report was mailed to the facility on to inspection were discussed with Mr. Arrospide and Ms. Kra	he date indicated below. Th	e results of this
The following paragraph appeared in the inspection report	of 3/1/2000:	
"The hazardous waste petroleum storage area is in hazardous waste storage tank requirements found in 40 CF provide a written narrative to the Dept. to address C.R. Wa including on-site storage and transportation to Keystone C Warner's management of rejected waste oil from the time processing to the time it is shipped off-site to a permitted f alternate plan for waste oil disposal during events where K have any questions about this request, please feel free to co Milburn, at 610-832-6159."  This narrative is still being requested. This should can be made as to the proper way to handle these hazardous	question with regards to come R Part 262.34 and Part 265, arner's procedures regarding tement Co. This narrative should that the waste is determined that the waste is determined that the waste is determined to actility. In this narrative you eystone Cement Co. is not acontact your waste management of the submitted as soon as possible	Subpart J. Please waste oil refusal ould fully detail C.R. to be unacceptable for should also address your ecepting wastes. If you not specialist, Michelle
This inspection report is notice of the findings of an inspection of notification of any violations observed during the inspection. Additional not herein, or other violations identified as a result of review of laboratory analyses. This report does not constitute an order or other appealable action of imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply comperson was shown the report or that a copy was left with the person.	ification of violations may be issued or Department records.  If the Department. Nothing contained in the Department.	concerning either violations noted nerein shall be deemed to grant or
Person interviewed (signature) copy mailed to facility	Date	6/8/2000
Inspector (signature) Michelle Milliam	Date	6/8/2000

Page 2 of 2

2500-FM-LRWM0276 Rev. 5/99



# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

nspection Date	3/1/2000
Time Start	
Time Finish	

<b>HAZARDOUS WASTE</b>	INSPECTION REPORT
<b>⊠</b> GENERATOR	S Q GENERATOR

LX.	GENERATOR	SQ GENER	RATOR
Company name	2. Warner, Inc.	I.D. Nur	mber <u>PA 0000538927</u>
Site Address Looso	W. Passyunk Ave.	, Philadel phi	.G
	Ohio Municipality P		
Name of Inspector	nichelle Milburn		
Name & Title of Respon	nsible Official Robert Krau	viecki, Presi	dent lowner
Person Interviewed $\underline{\mathcal{R}}_{\mathcal{C}}$	re Krawlecki / Javier Arm	<u>spido</u> Telepho	one (215) 726 - 4300
Mailing Address (if diffe	rent from above)		
Amount of Hazardous V	Vaste Generated per Month:	Pounds	> 1,000 - Kgs
1. Site Characterizati	on:		
STORAGE: 💢 C	Container 🔲 Tanks 🔲 Contain	ment Bldg. 🔲 Drip Pad	Other
PBR:	leutralization/WWTP 🔲 Reclaim	1	Other
GENERATOR TRE	ATMENT Containers	] Tanks	inment Bldg. 🔲 Drip Pad
2. Universal Waste:	☐ Large Quantity Handler	] Small Quantity Handle	er
Universal Wast	e Types		
3. Hazardous Waste			~ A() ()
Transporter Na	me C.R. Warner, Inc.	License	Number <u>PA - AH 0460</u>
Transporter Na	me	License	Number
Transporter Na	me	License	Number
4. Types of hazardou	us waste generated and destinati	on facility (location &	type).
Waste Code	Waste Descript	tion	Destination Facility
F005	Toluene	m	iarisol, Inc
		W.	ddiesex. NJ M202454544
F00.2	Dalata Dalata Da		••
F002	Maste Petroleum Pri	Saut Ke	ystone Coment, Co.
		PA	10 00:2389559

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name <u>C.R. Marrac Mc.</u> ID Number <u>PACCO 538827</u> Date <u>3/1/2000</u>

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
χ				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
			X	Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
			X	Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
			X	Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS **FACILITY SPECIFICS**

Site Name <u>C.R. Warner, Inc.</u> ID Number <u>PA0000538827</u> Date <u>3/1/2000</u>

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined

4 - Non Compliance

1 2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
			CONTAINERS (Subchapter I)			
$\mathbb{X}$			Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X			Containers of hazardous waste in good condition	265a.1	265.171	H026
The same of			Containers and stored waste compatible	265a.1	265.172	H027
X			Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X			Containers managed to prevent leaks	265a.1	265.173(b)	H029
X			Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X			Container storage areas inspected at least weekly	265a.1	265.174	H031
X			Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
$X_{\perp}$			Proper containment and collection systems in place	265a.179		H033
X			Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X			Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X			Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
1			Containers labeled accurately identify contents	SWMA		H037
IXI				6018.403(b)		
/ \	<u> </u>	L		(2)	<u> </u>	

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name	C.R. Warner	ID Number	PACCC0538827	Date 3/1/2000
	1 - No Violation Observed	2 - Not Applicable	3 - Not Determined	4 - Non Compliance

### STATUS PA CIT. FED CIT. LINE REQUIREMENT 25 PA CODE 40 CFR NO. LQG TANKS (Subchapter J) Tanks labeled "Hazardous Waste" 262a.10 262.34(a)(3) H040 Written certification by registered professional engineer 262a.10 265.192(a) H041 for proper tank (system) design and installation on file Secondary containment provided for tanks (systems) as 265a.193 265,193 H042 required Tanks (systems) managed to prevent rupture, leak, 265a.1 265.194 H043 corrode or fail Tanks labeled to accurately identify contents 265a.194 H044 Required inspections completed and documented in 265a 195 H045 265 195 operating log Release reported to Department within 24 hours, unless 265a.1 265,196 H046 Special requirements for ignitable and reactive wastes 265a.1 265,198 H047 followed H048 Special small quantity generator requirements 265a.1 265.201 SQG TANKS H051 Waste contents compatible with tank 265a.1 265.201(b)(2) H05% Uncovered tanks operated with 2 feet of freeboard or 265a.1 265.201(b)(3) equivalent containment capacity H053 If continuously fed, tank has method to stop inflow 265a.1 265.201(b)(4) H054 Daily tank inspection requirements complied with 265a.1 265.201(c)(1-3) H055 Weekly tank inspection requirements complied with 265a.1 265.201(c)(4,5) All waste removed at closure 265a.1 265.201(d) H056 H057 Special requirements for ignitable or reactive waste 265a.1 265.201(e)(1) complied with 265a.1 265.201(e)(2) H058 Covered tank buffer zone requirements complied with H059 Incompatible waste requirements met 265a.1 265.201(f)

## HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name C.R. Warner IDN	ber <u>PA 0000538827</u> Date <u>3/1/2000</u>
---------------------------	---

1 - No Violation Observed

2 - Not Applicable 3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
			L	Containment Buildings (Subchapter T)			
	X			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
	X			Meets special requirements if liquids present	265a.1	265.1101(b)	H062
	X			Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1) (i)	H063
	X			Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1) (ii)	H064
	X			Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1) (iii)	H065
	X			No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1) (iv)	H066
	Х			Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	χ			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
				Drip Pads (Subchapter S)			
	X			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
	X			Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
	X		L	(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
	χ			(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
	X			Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
	X			Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
	X			Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
	X			Release reporting requirements met	265a.1	265.443(m)	H076
	X			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

### COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS		
Date of inspection 01 March 2000 Identification Number	PA0000	538827
Company/Facility/Site Name C.R. Warner, Inc.		
A hazardous waste large-quantity generator inspection of C.R. Warner w Milburn and Andy Sinclair, Solid Waste Specialists, with the Department of Enfrom C.R. Warner were Rose Krawiecki and Javier Arrospide, Plant Manager.		•
The following observations were made:		
1) C. R. Warner generates waste toluene and waste petroleum products. on-site lab during acceptance testing of incoming wastes. The waste petroleum incoming residual oils that fail the acceptance testing and are determined to be holuene is transported to Marisol, Inc., for disposal, while the waste petroleum products.	product: azardou	s are a result of s wastes. The waste
2) Waste toluene is initially stored in a satellite accumulation container in and it was found that the accumulation container lacked proper labeling. The container lacked proper labeling lacked proper labeling. The container lacked proper labeling lacked l	ntainer of the state of the sta	should be marked as during the inspection; b is transferred to a ction, one drum of waste
3) A sample is procured from all incoming residual waste oil trucks. If the Warner's acceptance criteria, and the truck is from an outside hauling company, back to the generator. If the truck is a C.R. Warner truck, the waste oil is kept of designated area on site. Eventually the truck is sent out to Keystone Cement Coseveral trucks of refused waste oil were on site. They were parked on a concrete unloading area. Ms. Krawiecki stated that Keystone Cement Co. has temporarily hazardous oils due to an equipment problem at that site. For this reason, C.R. Voutgoing waste oil on site than usual. C.R. Warner manifests out these waste oil generator of the waste. The trucks which store the waste oil prior to transportation.	then the true At the pad adjusted warner of and as and as	e load is refused and sent ick which is parked at a time of the inspection, accent to the truck accepting these currently has more sumes the role of
This inspection report is notice of the findings of an inspection conducted by a representative notification of any violations observed during the inspection. Additional notification of violations may be issued or other violations identified as a result of review of laboratory analyses or Department records.  This report does not constitute an order or other appealable action of the Department. Nothing contimply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence with the findings on person was shown the report or that a copy was left with the person.	d concernion	ng either violations noted herein, rein shall be deemed to grant or
Person interviewed (signature) copy mailed to facility	Date	3/24/2000
Inspector (signature) Michell's Milliams	Date	3/24/2000

Page  $\underline{b}$  of  $\underline{8}$ 

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Date of inspection 01 March 2000 Ide	entification Number PA0000	538827
Company/Facility/Site Name C.R. Warner, Inc.		
currently do not comply with all of the storage requirements to containment requirements).	or tanks (specifically label	ing and secondary
4) Manifests for the waste toluene and waste petroleu which the designated facility name and site address block (blo 10) were not completed. The facility should ensure that all macopies of manifests were present, and past manifests were on	ock #9) and the US EPA nu anifests are fully and prope	ımber block (block #
5) The facility PPC Plan was available and was inspet the available copy appeared to be complete. Ms. Krawiecki for the facility. Employee training records were reviewed; the OSHA refresher training course. The 1997 Hazardous Waste in the process of typing up the 1999 report and stated that she verified that daily inspections of storage areas are conducted daily and weekly inspection report forms.	was unable to locate a South e facility has recently cond Biennial Report was on si- would be submitting it sho	rce Reduction Strategy ucted their annual te. Ms. Krawiecki was ortly. Ms. Krawiecki
The following violations were observed:		
Line H006: A manifest was found that was not fully completed destination facility was not designated on the manifest. This incorporated by 25 PA Code Chapter 262a.20, and to 25 PA designate a destination facility that is permitted to handle the hould also ensure that all outgoing manifests are fully and present the second	is contrary to 40 C.F.R. Pa Code Chapter 262a.20(1). waste on each outgoing ma	rt 262.20(b), as C. R. Warner should
Line H011: The satellite accumulation container in the lab la 40 CFR Part 262.34(c)(1)(ii) as incorporated by 25 PA Code label on satellite accumulation containers that reads "hazardo the container.  *** This violation was corrected during the inspection	Chapter 262a.10. The faci us waste" or in some way i	lity should provide a
This inspection report is notice of the findings of an inspection conduct notification of any violations observed during the inspection. Additional notification or other violations identified as a result of review of laboratory analyses or Department This report does not constitute an order or other appealable action of the imply immunity from legal action for any violation noted herein.  Signature by the person interviewed does not necessarily imply concurrence person was shown the report or that a copy was left with the person.	of violations may be issued concerni- ent records.  Department. Nothing contained he	ng either violations noted herein, rein shall be deemed to grant or
Person interviewed (signature) copy mailed to facility	Date	3/24/2000
Inspector (signature) Michelle Millerin	Date	3/24/2000
		Page of

## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

, mor consist	CI OILI OOMMENTO
Date of inspection 01 March 2000	Identification Number PA0000538827
Company/Facility/Site Name C.R. Warner, Inc.	
	to be located during the inspection. This is contrary to PA and implement a source reduction strategy and should keep
Two Violations Are Being Ci	ted. One violation has been corrected
hazardous waste storage tank requirements found in provide a written narrative to the Dept. to address C including on-site storage and transportation to Keys Warner's management of rejected waste oil from the processing to the time it is shipped off-site to a permyour alternate plan for waste oil disposal during eve you have any questions about this request, please fee Michelle Milburn, at 610-832-6159.  A copy of this report was mailed to the facility	cone Cement Co. This narrative should fully detail C.R. time that the waste is determined to be unacceptable for nitted facility. In this narrative you should also address nts where Keystone Cement Co. is not accepting wastes. If the free to contact your waste management specialist,
inspection were discussed with Mr. Arrospide and M	Is. Krawiecki before leaving the facility.
	<b>*</b>
notification of any violations observed during the inspection. Additional or other violations identified as a result of review of laboratory analyses.  This report does not constitute an order or other appealable imply immunity from legal action for any violation noted herein.	ction conducted by a representative of the Department. This report is formal notification of violations may be issued concerning either violations noted herein, or Department records. action of the Department. Nothing contained herein shall be deemed to grant or apply concurrence with the findings on this report, but does acknowledge that the
Person interviewed (signature) copy mailed to facility	Date _3/24/2000
Inspector (signature) Michaelle Millam	Date 3/24/2000
	Page <u>8</u> of <u>8</u>



Inspection Date	11/04/98
Time Start	
Tima Finish	

, j	AZARDOUS WASTE INSPECTION	REPORT
<i>y</i> (	<del></del>	ENERATOR
Company name CR.	(NATURE INC. YANKER BINT FRANCE F STREET & WEST PASSY	D. Number 301285
County Phila	Municipality Phila	7IP 19153
Name of Inspector	DIRK ROBINSON	Zir
Name & Title of Respons	ible Official ROBERT J. KRAWIE	ecti / PRESIDENT-OWN
Person Interviewed 7	OLN MYERS OIL MANAGER T	Telephone (215) 726 4300
Mailing Address (if different	ent from above) SAMR	
Amount of Hazardous W	aste Generated per Month: Po	ounds 2/000 Kgs
1. Site Characterizatio		-
STORAGE: Co	ntainer     □ Tanks     □ Containment Bldg.   □ Drip	Pad Other
	utralization/WWTP   Reclaim	Other
Generator Treatment	☐ Containers ☐ Tanks ☐ Containm	nent Bldg. 🔲 Drip Pad
2. Universal Waste: [	☐ Large Quantity Handler ☐ Small Quantity H	Handler
Universal Waste	Types	
3. Hazardous Waste T	ransporters:	
Transporter Nam	e L	icense Number
Transporter Nam	e L	icense Number
Transporter Nam	e L	icense Number
4. Types of hazardous	waste generated and destination facility (locati	ion & type).
Waste Code	Waste Description	Destination Facility
Dool	KAPTHA SOLVENT	KEYSTONE GENENT
F005	TOLVENE	
7		
		· · · · · · · · · · · · · · · · · · ·

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CR- WARNEX	<u>)                                    </u>	D Number #10/8/0	8538827 Date	11/04/98
1 - No Violation Observed	2 - Not Applicable			7

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
X				Hazardous waste determination performed on all waste streams	262.11	H001
Á				Identification Number	262.12	H002
				Licensed transporters only	262.12(b)	H003
$\prod$				TSD Authorization received for wastes shipped within PA	262.13	H004
				Proper manifest used .	262.20	H005
V				Manifests filled out correctly and completely	262.20(g)	H006
$\chi$				Manifests routed properly and within time limits	262.23	H007
			X	Generator waste accumulated on site for 90 days or less	262.34(a)	H008
X				SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H009
N				SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H010
$\prod$				Satellite accumulation requirements complied with	262.34(c)	H011
				Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e))	262.34(a)(5), 262.34(e)	H012
X				Manifest and biennial reports retained for 3 years	262.40(a)(b)	H013
			X	Specified records retained for 20 years	262.40(c)(e)	H014
$_{\perp}$			X	Biennial reports submitted to the Department (LQG only)	262.41	H015
$\bigstar$	•			Exception reporting procedures followed	262.42	H016
7				Spill reporting procedures followed	262.46	H017
				PPC plan developed and implemented	262.46	H018
				Special requirements followed for international shipments	262.50	H019
7				Source reduction strategy prepared and available (LQG only)	262.80	H020
4	-	-	-	Excluded waste complies with exclusionary requirements	261.4	H021
1						
1			_			
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+						
				• ··		

## **HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

Site Name CR- WARNER ID Number PAOSSOS

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
			CONTAINERS (Subchapter I)		
			Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
			Containers of hazardous waste in good condition	265.171	H026
			Containers and stored waste compatible	265.172	H027
			Containers kept closed except during addition or removal of wastes	265.173	H028
			Containers managed to prevent leaks	265.173(b)	H029
			Containers labeled to accurately identify contents	265.173(c)	H030
			Container storage areas inspected at least weekly	265.174	H031
			Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
$\perp$		L	Proper containment and collection systems in place	265.178(a)-(d)	H033
1			All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
1			Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
					H036
					H037
					H038
			TANKS (Subchapter J)		
	X		Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
	9		Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
			Secondary containment provided for tanks (systems) as required	265.193	H041
			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
			Tanks labeled to accurately identify contents	265.194(d)	H043
			Required inspections completed and documented in operating log	265.195	H044
			Release reported to Department within 24 hours, unless exempted	265.196	H045
	0		Special requirements for ignitable and reactive wastes followed	265.198	H046
	X		SQ Generator complies with 265.201	262.34(e)(3)	H047

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### INSPECTION REPORT COMMENTS

Date of inspection: 11/04/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

A hazardous waste follow up inspection was conducted by the Department on the above referenced facility. Violations that are still outstanding from the June 17, 1998 inspection are as follows:

- 1. Tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) of solvent, D001, were stored over the ninety (90) day limit.
- 2. An annual biennial hazardous waste report for fiscal year 1997 has not been submitted to the Departemt.

Signature Will Signature

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.



## Pennsylvania Department of Environmental Protection

555 North Lane Conshohocken, PA 19428 November 17, 1998

Southeast Regional Office

610-832-6212 Fax 610-832-6143

### **NOTICE OF VIOLATION**

Mr. Robert J. Krawiecki Yankee Point Realty 61<sup>st</sup> Street and Passyunk Avenue Philadelphia, PA 19153

Re: Hazardous Waste Inspection

C.R. Warner
PA0000538827
Philadelphia County
June 17, 1998

Dear Mr. Krawiecki:

This letter is to confirm the findings of the Department's joint inspection with Environmental Protection Agency (EPA) on June 17, 1998, of your hazardous waste activities. Requirements for hazardous waste facilities are contained in the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); The Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. § 691.1 et seq.; Section 1917-A of the Administrative Code of 1929, P.L. 177 as amended, 71-.A § 510-17; and Chapters 260 through 270 of the rules and regulations of the Department. Violation of applicable sections of these regulations revealed during the Department's inspection on June 17, 1998 are as follows:

§ 6018.401(a) - No person or municipality shall store, transport, treat, or dispose of hazardous waste within this Commonwealth unless such storage, transportation, treatment, or disposal is authorized by the rules and regulations of the department; no person or municipality shall own or operate a hazardous waste storage, treatment or disposal facility unless such person or municipality has first obtained a permit for the storage, treatment and disposal of hazardous waste from the department; and no person or municipality shall transport hazardous waste within the Commonwealth unless such person or municipality has first obtained a license for the transportation of hazardous waste from the department.

C.R. Warner, Yankee Point Terminal stored tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) which contained a D001 hazardous waste solvent over the ninety (90) day limit.

§ 6018.403(a) - It shall be unlawful for any person or municipality who generates, transports or stores hazardous waste to transfer such waste unless such person or municipality complies with the rules and regulations of the Department and the terms or conditions of any applicable permit or license and any applicable order issued by the Department.

C.R. Warner, Yankee Point Terminal stored tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) which contained a D001 hazardous waste solvent over the ninety (90) day limit.

§ 262.34(a) - Except as provided in subsections (d)-(f), a generator may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status if the following apply under § 262.34 (a)(1-5)

C.R. Warner, Yankee Point Terminal stored tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment) which contained a D001 hazardous waste solvent over the ninety (90) day limit.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at (610) 832-6168.

Sincerely,

Dirk K. Robinson

Waste Management Specialist Waste Management Program

cc:

Compliance

**EPA** 

Field File

Re 30 (SMC98)320-6



Inspection Date	06/17/98
Time Start	8:00 Am
Time Finish	8:30 Pm

1 P	ENERATOR	NSPECTION S S Q GE		R	
Company name C.K.	WATNER-YANKER	Fout Frank	A.C. D. Number <u>IA</u>	666653	3827
Site Address	- Street & a	est GASSY	UNK /	AVE To	lila
County Phila	Municipality	Plike	ZIP	19153	
Name of Inspector	NIRK Kobins			<del></del>	
Name & Title of Responsible	e Official KOSERT	J. KRAWIE	cki /f	resident	
Person Interviewed	or prospide logore	TIONS MANAGERE	elephone <u>(2/5</u>	72643	300
Mailing Address (if different	from above)	SAME			
Amount of Hazardous Wasi	e Generated per Month:	Pou	ınds	1000	_ Kgs
1. Site Characterization:					
STORAGE: 💆 Conta	niner 🗆 Tanks 🔲 Contain	ment Bldg.   Drip	Pad Other_		
PBR: ☐ Neutr	alization/WWTP   Reclain	า	Other		
Generator Treatment	☐ Containers ☐ Tanks	□Containme	ent Bldg.	☐ Drip Pad	
2. Universal Waste:	Large Quantity Handler [	☐ Small Quantity H	andler		
Universal Waste Ty	pes				
3. Hazardous Waste Trai	nsporters:				
Transporter Name		Lic	cense Number		
	aste generated and destinat				
Waste Code	Waste Descrip	tion	Destina	ation Facility	
P001	NAPLA SOL	LVENT			
F005	TOLUENE				

# HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Δ .	IAULIII	בטוו וטט		,
Site Name C.R. WALNE	FR _ ID Numbe	· PADOSS 5388	27Date 06/	17/98
1 - No Violation Observed 2	2 - Not Applicable 3 - No	ot Determined 4 - Non Con	npliance	

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
X	,			Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X			_	Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
$\geq$				Containers managed to prevent leaks	265.173(b)	H029
	_		X	Containers labeled to accurately identify contents	265.173(c)	H030
		X		Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
			$\geq$	Proper containment and collection systems in place	265.178(a)-(d)	H033
X			_	All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
			X	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
		,				H036
						H037
						H038
				TANKS (Subchapter J)		
	X			Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
	1			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
				Secondary containment provided for tanks (systems) as required	265.193	H041
	- Carper and a second			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
				Tanks labeled to accurately identify contents	265.194(d)	H043
				Required inspections completed and documented in operating log	265.195	H044
	j			Release reported to Department within 24 hours, unless exempted	265.196	H045
	8			Special requirements for ignitable and reactive wastes followed	265.198	H046
	X			SQ Generator complies with 265.201	262.34(e)(3)	H047

## HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

OLITERATIONS			,
Site Name C.R. WAUNER	ID Number PA DR	553882 FDate	06/17/98
1 - No Violation Observed 2 - Not /		4 - Non Compliance	

2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
			Hazardous waste determination performed on all waste streams	262.11	H001
			Identification Number	262.12	H002
			Licensed transporters only	262.12(b)	H003
			TSD Authorization received for wastes shipped within PA	262.13	H004
			Proper manifest used	262.20	H005
			Manifests filled out correctly and completely	262.20(g)	H006
			Manifests routed properly and within time limits	262.23	H007
	X		Generator waste accumulated on site for 90 days or less	262.34(a)	H008
X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H009
$\Delta$			SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H010
X			Satellite accumulation requirements complied with	262.34(c)	H011
		X	Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e))	262.34(a)(5), 262.34(e)	H012
		X	Manifest and biennial reports retained for 3 years	262.40(a)(b)	H013
			Specified records retained for 20 years	262.40(c)(e)	H014
		X	Biennial reports submitted to the Department (LQG only)	262.41	H015
	X		Exception reporting procedures followed	262.42	H016
	X		Spill reporting procedures followed	262.46	H017
			PPC plan developed and implemented	262.46	H018
X			Special requirements followed for international shipments	262.50	H019
	X		Source reduction strategy prepared and available (LQG only)	262.80	H020
X		-	Excluded waste complies with exclusionary requirements	261.4	H021
-		-			
		-			
	-	$\dashv$			
$\dashv$	$\dashv$				
		2 3	2 3 4	Hazardous waste determination performed on all waste streams Identification Number Licensed transporters only TSD Authorization received for wastes shipped within PA Proper manifest used Manifests filled out correctly and completely Manifests routed properly and within time limits Generator waste accumulated on site for 90 days or less SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days SQG waste accumulated on-site never exceeds 6000 kg Satellite accumulation requirements complied with Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e)) Manifest and biennial reports retained for 3 years Specified records retained for 20 years Biennial reports submitted to the Department (LQG only) Exception reporting procedures followed Spill reporting procedures followed Spill reporting procedures followed Special requirements followed for international shipments Source reduction strategy prepared and available (LQG only)	Hazardous waste determination performed on all waste streams    Identification Number   262.12

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### INSPECTION REPORT COMMENTS

Date of inspection: 06/17/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

A hazardous waste inspection was conducted by the Department on the above referenced facility and the following violations were revealed:

- 1. An annual biennial hazardous waste report for fiscal year 1997 has not been submitted to the Department.
- 2. Incomplete personnel training program and/or records per § 265.16. No listing of job titles, no written job descriptions, no written description of the type of training required, not able to present records to indicate that all personnel required have had forty (40) hour training.
- 3. Two fifty-five gallon drums of toluene stored over the ninety (90) day limit.
- 4. Other violations as checked off on the inspection report

## Information requested by the Department:

- A. Available internal and external documentation of tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment), that includes their accumulation start dates, and lab results of each tanker.
- B. Documentation of all returned loads to each customer for the past two years.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Signature

Date

Page 4 of

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### INSPECTION REPORT COMMENTS

Date of inspection: 06/17/98
------------------------------

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

- C. Records for the past two years for any sludge's that have been shipped off site. The records should indicate where the sludge's originated from, their quantities, and their analytical results.
- D. Records of tank integrity tests and pipe line tests.
- E. The facility's last six (6) months of inspection records of tanks, drums, and tanker trucks.
- F. A hazardous waste analysis of the two fifty-five gallon waste toluene drums.
- G. C.R. Warner should notify the Department fourteen (14) days prior to shipping off site any of the tankers listed above in item (A).

Signature LOK Folkerson

Date \_\_\_\_\_

Page \_\_\_\_\_of \_\_\_

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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## COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 06/17/98

Time Start 8:30 Pm

<b>HAZARDOUS WASTE</b>	<b>INSPECTION REPORT</b>
GENERATOR	☐ S Q GENERATOR

		SENERAI		_ Su			
Company name	CC.	WAINE	R-YANTE	E POINT ES	رم بهر I.D. Numb	per PADE DE	53 <u>8</u> 827
Site Address	6/5	- Stre	of & C	Vest 8/AS	SYUNK	AVE	Hala
County $\mathcal{P}$	Lile		Municipality _	Plike	1 /	ZIP 191.	5_3
Name of Inspec	tor	1) SEK	Kahin	(AA)			
Name & Title of	Responsib	le Official	ROSERI	J. KRAC	sjecki	Preside	ext_
Person Interviev	ved Velle	N MYER	ide lovers	MANAGER TIONS MANA	<i>€E</i> elephon	e 1215 72	54300
Mailing Address	(if different	t from above)		SAME	-		
Amount of Haza	rdous Was	te Generated	per Month:		Pounds _	>100	Kgs
1. Site Charac							
STORAGE:	☑ Conta	ainer 🗆 Tai	nks 🔲 Contai	nment Bldg. 🛘	Drip Pad	Other	
	•		TP 🛛 Reclair			Other	
Generator T	reatment	☐ Container:	5 ☐ Tanks	□ Conta	ainment Bldg	. 🔲 Drip Pa	d
2. Universal V	Vaste: 🔲	Large Quantit	y Handler	Small Quant	ity Handler		
Univers	al Waste Ty	ypes					
3. Hazardous	Waste Tra	nsporters:				•	
Transpo	rter Name				_ License N	umber	
Transpo	rter Name				License N	umber	
Transpo	nter Name				License N	umber	
4. Types of ha	azardous v	vaste generat	ed and destina	tion facility (lo	cation & ty	pe).	
Waste	Code		Waste Descrip			Destination Fac	ility
700	5 l	NA	PLA SO	LVENT			
For	5	Tol	UENE				
	-						
						···	
					1		

## **HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS**

ID Number /

1 - No Violation Observed

2 - Not Applicable

3 - Not Determined 4 - Non Compliance

2			REQUIREMENT	CHAPTER CIT.	LINE
TT			CONTAINERS (Subchapter I)		
			Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
$\langle    $			Containers of hazardous waste in good condition	265.171	H026
			Containers and stored waste compatible	265.172	H027
			Containers kept closed except during addition or removal of wastes	265.173	H028
			Containers managed to prevent leaks	265.173(b)	H029
$\Box$		X	Containers labeled to accurately identify contents	265.173(c)	H030
	$\times$		Container storage areas inspected at least weekly	265.174	H031
X ]			Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
		$\times$	Proper containment and collection systems in place	265.178(a)-(d)	H033
			All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
		X	Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
	,				H036
$\prod$					H037
					H038
			TANKS (Subchapter J)		
X			Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
1			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
			Secondary containment provided for tanks (systems) as required	265.193	H041
			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
$\Pi$			Tanks labeled to accurately identify contents	265.194(d)	H043
			Required inspections completed and documented in operating log	265.195	H044
			Release reported to Department within 24 hours, unless exempted	265.196	H045
V			Special requirements for ignitable and reactive wastes followed	265.198	H046
IX			SQ Generator complies with 265.201	262.34(e)(3)	H047

## HAZARDOUS WASTE INSPECTION REPORT **GENERATORS -- SMALL QUANTITY GENERATORS**

Site Name C.R. WASNER	ID Number <u>PA ØØØ53882</u> 7 Date	06/17/9	78

1 - No Violation Observed 2 - Not Applicable

3 - Not Determined 4 - Non Compliance

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
X				Hazardous waste determination performed on all waste streams	262.11	H001
X				Identification Number	262.12	H002
$\times$				Licensed transporters only	262.12(b)	H003
X				TSD Authorization received for wastes shipped within PA	262.13	H004
X				Proper manifest used	262.20	H005
X				Manifests filled out correctly and completely	262.20(g)	H006
$\times$				Manifests routed properly and within time limits	262.23	H007
		X		Generator waste accumulated on site for 90 days or less	262 34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H010
	X			Satellite accumulation requirements complied with	262.34(c)	H <b>0</b> 11
			X	Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e))	262.34(a)(5), 262.34(e)	H012
			X	Manifest and biennial reports retained for 3 years	262.40(a)(b)	H013
				Specified records retained for 20 years	262.40(c)(e)	H014
			X	Biennial reports submitted to the Department (LQG only)	262.41	H015
		X		Exception reporting procedures followed	262.42	H016
		X		Spill reporting procedures followed	262.46	H017
$\times$				PPC plan developed and implemented	262.46	H018
	X			Special requirements followed for international shipments	262.50	H019
		X		Source reduction strategy prepared and available (LQG only)	262.80	H020
	X			Excluded waste complies with exclusionary requirements	261.4	H021
		_				

## **COMMONWEALTH OF PENNSYLVANIA** DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection: 06/17/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

A hazardous waste inspection was conducted by the Department on the above referenced facility and the following violations were revealed:

- 1. An annual biennial hazardous waste report for fiscal year 1997 has not been submitted to the Department.
- 2. Incomplete personnel training program and/or records per § 265.16. No listing of job titles, no written job descriptions, no written description of the type of training required, not able to present records to indicate that all personnel required have had forty (40) hour training.
- 3. Two fifty-five gallon drums of toluene stored over the ninety (90) day limit.
- 4. Other violations as checked off on the inspection report

Information requested by the Department:

- A. Available internal and external documentation of tankers T-4, 707, T-9, T-3, F-15, F-8, F-10, F-6 (front compartment), that includes their accumulation start dates, and lab results of each tanker.
- B. Documentation of all returned loads to each customer for the past two years.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply mmunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person

was shown the report or that a copy was left with the person,

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

# COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

### INSPECTION REPORT COMMENTS

Da	ate	of	ins	pection:	06/17/98

Facility/Site Name: C.R. Warner, Inc. - Philadelphia County

- C. Records for the past two years for any sludge's that have been shipped off site. The records should indicate where the sludge's originated from, their quantities, and their analytical results.
- D. Records of tank integrity tests and pipe line tests.
- E. The facility's last six (6) months of inspection records of tanks, drums, and tanker trucks.
- F. A hazardous waste analysis of the two fifty-five gallon waste toluene drums.
- G. C.R. Warner should notify the Department fourteen (14) days prior to shipping off site any of the tankers listed above in item (A).

Signature Ock Fotonson

Date \_\_\_\_\_\_\_\_

Page \_\_\_\_\_of \_\_\_

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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## Pennsylvania Department of Environmental Protection

### Lee Park, Suite 6010 555 North Lane Conshohocken, PA 19428 July 22, 1998

Southeast Regional Office

Fax 610-**832-**62-5

Mr. Robert J. Krawiecki Yankee Point Realty 61<sup>st</sup> Street and Passyunk Avenue Philadelphia, PA 19153

Re: Hazardous Waste Inspection

PA0000538827 Philadelphia County June 17, 1998

### Dear Mr. Krawiecki:

This letter is to confirm the findings of the Department's joint inspection with the Environmental Protection Agency (EPA) on June 17, 1998, of your hazardous waste activities. Requirements for hazardous waste facilities are contained in the Solid Waste Management Act of the Commonwealth of Pennsylvania, Act of July 7, 1980 P.L. 380, as amended, 35 P.S. § 6018.101 et seq. ("SWMA"); The Clean Streams Law, Act of June 22, 1937, P.L. 1987, as amended, 35 P.S. § 691.1 et seq.; Section 1917-A of the Administrative Code of 1929, P.L. 177 as amended, 71- A § 510-17; and Chapters 260 through 270 of the Rules and Regulations of the Department. Violations of applicable sections of these regulations revealed during the Department's inspection on June 17, 1998 are as follows:

§ 262.34(a) - Except as provided in subsections (d)-(f), a generator may accumulate hazardous waste on site for 90 days or less without a permit or without having interim status if the following apply under § 262.34 (a)(1-5)

C.R. Warner, Yankee Point Terminal stored two-55 gallon containers of solvent waste for more than 90 days.

§ 262.34(a)(5) - The generator complies with the requirements for owners or operators in Chapter 265, Subchapters C and D (relating to preparedness and prevention; and preparedness, prevention and contingency (PPC) plan and emergency procedures) and with § 265.16 (relating to personnel training).

It was determined that C.R. Warner, Yankee Point Terminal had incomplete personnel training records. Personnel training records did not have listing of job titles, written job descriptions, or written description of the type of training required. C.R. Warner, Yankee Point Terminal was not able to present records to indicate that all persons required to have 40 hour training have completed the training.

- § 262.40(b) A generator shall retain a copy of each biennial report and exception report for at least 3 years from the due date of the report.
- C.R. Warner, Yankee Point Terminal was not able to furnish a copy of the latest hazardous waste biennial report at the time of the inspection.
- § 262.41 A generator other than a small quantity generator or a conditionally exempt small quantity generator shall submit biennial reports as required under § 262.41.(1-2).
- § 265.173(c) A container shall be labeled to accurately identify the contents.
- C.R. Warner, Yankee Point Terminal failed to accurately identify one (55) gallon container of solvent waste.
- § 265.178(a) Container storage areas shall have a containment system capable of collecting and holding spills, leaks and precipitation.
- C.R. Warner, Yankee Point Terminal failed to store three (55) gallon containers in a proper containment area.
- § 6018. 403(a) It shall be unlawful for any person or municipality who generates, transports or stores hazardous waste to transfer such waste unless such person or municipality complies with the Rules and Regulations of the Department and the terms or conditions of any applicable permit or license and any applicable order issued by the Department.
- C.R. Warner, Yankee Point Terminal failed to comply with the rules and regulations of the Department.
- § 6018.403(b)(2) It shall be unlawful for any person or municipality who generates, transports, stores, treats or disposes of hazardous waste to fail to label any containers used for the storage of such hazardous waste so as identify accurately such waste.

C.R. Warner, Yankee Point Terminal failed to properly identify one (55) gallon container of solvent.

§ 6018.403(b)(9) - It shall be unlawful for any person or municipality who generates, transports, stores, treats or disposes of hazardous waste to fail to treat, store and dispose of all waste in accordance with the Rules and Regulations of the Department, permit conditions and orders of Department.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Towards this end, you are requested to submit to the Department within 14 days a proposed program and schedule for abatement of these violations.

This letter does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Protection, heretofore or hereafter existing.

This letter shall also not be construed as a final action of the Department of Environmental Protection.

If you have any questions concerning this matter, please feel free to contact me at 610-832-6168.

Sincerely.

Dirk K. Robinson

Waste Management Specialist Waste Management Program

cc:

Compliance EPA Field File Re 30 (SM)921